

Remarks

Applicants appreciate Examiner's acceptance of the prior arguments as persuasive.

Applicants have amended claim 1 to add a comma to make  
5 the claim easier to read. No change in scope is intended by the change.

On Page 3 of the Official Action, claims 1-4, 8, 11-14, 18, 21-24 and 28 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Provisional Patent Application  
10 60/201,234 ("Bailey") and U.S. Provisional Patent Application 60/190,364 ("Chiang"). This rejection is respectfully traversed.

First, Baily recites software on a server. Examiner attempts to show a motivation to combine Baily and Chiang,  
15 but Chiang's HTML editors are visual HTML editors, which are client products that have not been described in either Baily or Chaing to allow them to run on a server. Thus, Examiner's combination is respectfully asserted to not work for its intended purpose. As such, no one skilled in the  
20 art would make the combination proposed by Examiner because it wouldn't work.

With respect to Baily, Examiner asserts that Figure 2, element 218, stores the file responsive to the information

to be contained in the file received. However, the provisional application, Baily Figure 2 has no element 218. By referring to element 218 of Figure 2, Examiner appears to mean the Baily *published application* (and the reference to element 218 of Figure 2 does state that it is to Baily, and not to the provisional application). This issue was properly addressed, and laid to rest, in the prior office action response: Applicant's provisional application was filed in November of 2000, and the Baily published application as filed in July of 2001, after the date of disclosure of all of the claimed elements in Applicants' provisional application, as was set forth in the table of Applicants' previous office action response. It is true that the Baily provisional was filed before Applicants' provisional, but element 218 of Figure 2 in Baily's published application wasn't in the provisional. Thus, it is not prior art with respect to the present application and its use is improper. Because the Baily provisional does not contain element 218 of Figure 2 of the Baily published application, claims 1, 11 and 21 are allowable over it.

On page 5, examiner relies on the rejection above for the rejection of claims 6-7, 16-17, and 26-27 and further in view of Guck. This rejection is traversed for the same

reason as described above. Thus, claims 6-7, 16-17, and 26-27 are allowable over the cited references.

On page 6 of the Official Action, Examiner rejects claims 9-10, 19-20 and 29-30 under 35 U.S.C. 103(a) as being unpatentable over Baily and Guck. This rejection is respectfully traversed.

Claim 9 recites, "retrieving the file; and retrieving a shadow file having a filename comprising the filename of the file and containing information about the file." Claim 10 depends from claim 9 and recites all of its features.

Claim 19 recites, "the file manager for, responsive to the identifier of the file received at the input retrieving via an input/output the file and a shadow file". Claim 20 depends from claim 19 and contains all of its features.

Claim 29 recites, "retrieve the file; and retrieve a shadow file having a filename comprising the filename of the file and containing information about the file". Claim 30 depends from claim 29 and contains all of its features.

These claimed features retrieve two files.

Guck Figure 2A appears to retrieve one file (the RTF file) and then writes other files. The other files are not retrieved in Figure 2A. Guck explains in the description of the drawings at column 5, lines 30-33, and clearly shows

that the shadow file is written, but not read. Examiner has not asserted, and applicants do not believe, that Baily shows these features either.

Thus, claims 9, 19 and 29 are patentably  
5 distinguishable over Baily and Guck. Because claim 10 depends from claim 9, claim 20 depends from claim 19, and claim 30 depends from claim 29, claims 9-10, 19-20, and 29-30 are patentably distinguishable over Baily or Guck.

Claims 9 and 29 have been amended to recite that both  
10 retrievals are performed responsive to the request for the file to clarify that this is the case, as was set forth in original claim 19. Support for this amendment is found in the specification including, without limitation, at page 19, lines 9-19.

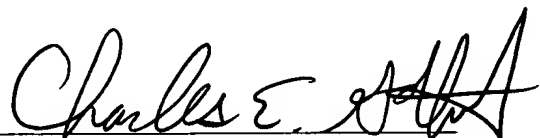
15 The claims are now allowable over the cited references. Favorable action is solicited.

Respectfully submitted,

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